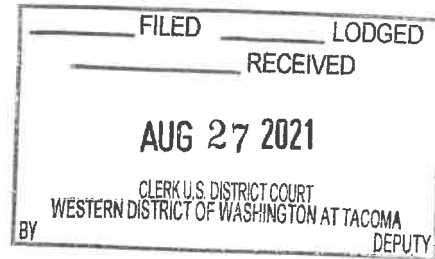


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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

Preiest D. Smith

CASE NO. 3:21-cv-05624-BHS  
[to be filled in by Clerk's Office]

COMPLAINT FOR A CIVIL CASE

Jury Trial: ☒ Yes ☐ No

Plaintiff(s),

v.

Tacoma Police Dept  
Officer Schillens

Defendant(s).

I. THE PARTIES TO THIS COMPLAINT

A. Plaintiff(s)

*Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.*

Name

Preiest D. Smith

Street Address

826 St. Helen's Ave #301

City and County

TACOMA, WA 98402

State and Zip Code

Telephone Number

(213) 644-0347

JPP Rend 8/27/21 00-00 161618

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## 1 B. Defendant(s)

2 *Provide the information below for each defendant named in the complaint, whether the*  
 3 *defendant is an individual, a government agency, an organization, or a corporation. For an*  
 4 *individual defendant, include the person's job or title (if known). Attach additional pages if*  
 5 *needed.*

## 6 Defendant No. 1

7 Name

8 Job or Title (if known)

9 Street Address

10 City and County

11 State and Zip Code

12 Telephone Number

Officer Schillen's

Tacoma Police Dept

TALOMA, WA

## 13 Defendant No. 2

14 Name

15 Job or Title (if known)

16 Street Address

17 City and County

18 State and Zip Code

19 Telephone Number

Tacoma Police Dept

TALOMA WA

## 20 Defendant No. 3

21 Name

22 Job or Title (if known)

23 Street Address

24 City and County

State and Zip Code

Telephone Number

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Defendant No. 4

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

**II. BASIS FOR JURISDICTION**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*☐ Federal question☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

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## B. If the Basis for Jurisdiction Is Diversity of Citizenship

## 1. The Plaintiff(s)

## a. If the plaintiff is an individual.

The plaintiff (name) Prelest Smith, is a citizen of the  
State of (name) Washington.

## b. If the plaintiff is a corporation.

The plaintiff, (name) Prelest Smith, is incorporated under  
the laws of the State of (name) Washington, is incorporated under  
the laws of the State of (name) \_\_\_\_\_, and has its principal  
place of business in the State of (name) \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

## 2. The Defendant(s)

## a. If the defendant is an individual.

The defendant, (name) Officer Schillien's, is a citizen of the  
State of (name) Tacoma Washington. Or is a citizen of  
(foreign nation) \_\_\_\_\_.

## b. If the defendant is a corporation.

The defendant, (name) Tacoma Police Dept, is incorporated under  
the laws of the State of (name) Washington, and has its principal  
place of business in the State of (name) \_\_\_\_\_.

Or is incorporated under the laws of (foreign nation) \_\_\_\_\_,  
and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

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## 3. The Amount in Controversy.

The amount in controversy-the amount the plaintiff claims the defendant owes or the amount at stake-is more than \$75,000, not counting interest and costs of court, because (explain):

I can not go anywhere and get a job I'm told there not hire our you need experience. They have seen the paper and people take pictures of me ~~not~~ no one will hire me because of this officer not being truthful

**III. STATEMENT OF CLAIM**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

this office has jeopardize my life my living my children he has made my life hell. I someone will hire my side. The jail took a uA. from me me no meth in my uA.

**IV. RELIEF**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I am asking for the damage this has put me i my kids through I am asking for over 1 million

**V. CERTIFICATION AND CLOSING**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper

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1 purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;  
2 (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or  
3 reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so  
4 identified, will likely have evidentiary support after a reasonable opportunity for further  
5 investigation or discovery; and (4) the complaint otherwise complies with the requirements of  
6 Rule 11.

7 I agree to provide the Clerk's Office with any changes to my address where case-related  
8 papers may be served. I understand that my failure to keep a current address on file with the  
9 Clerk's Office may result in the dismissal of my case.

Date of signing:

8/27/21

Signature of Plaintiff



Printed Name of Plaintiff

Prelest Smith

Date of signing:

Signature of Plaintiff

Printed Name of Plaintiff

Date of signing:

Signature of Plaintiff

Printed Name of Plaintiff

July 20 2021 11:56 AM

KEVIN STOCK  
COUNTY CLERK**SUPERIOR COURT OF WASHINGTON FOR PIERCE COUNTY**

STATE OF WASHINGTON

CAUSE NO. 21-1-01847-3

Plaintiff,

vs.

DECLARATION FOR DETERMINATION OF  
PROBABLE CAUSE

(ADPC)

PREIEST DARRIN SMITH,

AKA

DARRIN SMITH

PREIEST DARREN SMITH

PREIEST DARRIN SMITH,

JR

PREIEST D SMITH

SARRIN SMITH PRSIEST

SMITH DPREIEST

SMITH DPREISEST

SMITH SHERMAN

Defendant.

DOB: 02/17/1973

MAUREEN C. GOODMAN declares under penalty of perjury:

That I am a deputy prosecuting attorney for Pierce County and I am familiar with the police report and/or investigation conducted by the TACOMA POLICE DEPARTMENT, incident number 2120000960;

That the police report and/or investigation provided me the following information;

That in Pierce County, Washington, on or about July 18, 2021, the defendant, PREIEST DARRIN SMITH, did commit assault in the second degree and unlawful imprisonment.

According to Officer Schillen's report, he and other officers were dispatched to investigate a reported burglary in progress. The reporting party, later identified as the defendant, had called 911 and reported that a woman had broken into his apartment and that he had handcuffed and maced her. The original call had come in an hour

1 earlier and 911 had tried to call back but did not get an answer.

2  
3 Upon arrival, the officers were contacted by the defendant at the front entrance.  
4 The defendant wanted the officers to go to his apartment and arrest the female. The  
5 defendant stated that he did not know the female and that he had maced her and had  
6 her handcuffed in the kitchen. When asked if the female had any other injuries, the  
7 defendant stated that she had blood on her face from him "taking her down." The  
8 officers entered the defendant's through the unlocked door and found V.D.G. in the  
9 kitchen sitting on the floor. V.D.G. had her arms behind her back and there were plastic  
10 handcuffs on her wrists. There was also a blue USB cable wrapped around both wrists.  
11 V.D.G. had a bloody nose, some bruising around her chin and both eyes were swollen.  
12 There was also bruising on her arms. Officers removed the restraints and took V.D.G.  
13 outside. Medical Aid was summoned to evaluate V.D.G.

14 V.D.G. reported that she did not break into the apartment and was the victim of an  
15 assault and being held hostage. V.D.G. appeared to possibly be under the influence of  
16 a substance or having a mental state issue. V.D.G. stated that she was in Lakewood  
17 and attempting to prostitute herself when the defendant picked her up and took her to  
18 his apartment. They did not have sex but smoked methamphetamine during the night  
19 and into the morning hours. At one point, V.D.G. attempted to leave through the front  
20 door but the defendant prevented her from leaving. The defendant accused her of  
21 stealing methamphetamine and was beaten and tied up over the course of a couple of  
22 hours. V.D.G. stated that the defendant punched her multiple times and maced her.  
23 She was tied up twice. Medical Aid reported that V.D.G. may have a broken nose and  
24 transported her to the hospital for evaluation.

25 The defendant reported that he returned home at approximately 12:30 and entered  
26 his apartment. The defendant stated he heard sounds and then found V.D.G. in his  
bedroom looking for things. The defendant stated that he pepper sprayed V.D.G. in the  
face and put her on the bed. The defendant stated that he put the plastic handcuffs on  
V.D.G. and also used the USB cord as the handcuffs were fake. The defendant then  
opened the windows and got a wet towel for V.D.G.'s face. The defendant stated he  
unlocked his door with a key when he returned. The apartment complex entrances are  
only accessible with a key card and there was no damage to the defendant's door. The  
defendant stated that anyone could gain access using a crowbar to pry open the  
deadbolt lock. When asked about the significant injuries to V.D.G.'s face, the defendant  
stated that the injuries were already there and he did not cause them. When told of  
V.D.G.'s allegations, the defendant stated she was lying and that he was in Seattle all  
night with friends and family but would not provide any name to contact for verification.  
The defendant was arrested and a search of his person revealed a baggie containing  
suspected methamphetamine. The defendant stated it was not his and he did not know  
how it had come to be in his possession.

PREIEST DARRIN SMITH--21-1-01847-3 --3647734

1 I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE  
2 OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.

3 DATED: July 20, 2021.

4 PLACE: TACOMA, WA

/s/ MAUREEN C. GOODMAN

MAUREEN C. GOODMAN, WSB#  
34012

Deputy Prosecuting Attorney